

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

<p>DEAN OBEIDALLAH, Plaintiff, v. ANDREW B. ANGLIN, DBA <i>Daily Stormer</i>, and MOONBASE HOLDINGS, LLC, DBA Andrew Anglin, and JOHN DOES NUMBERS 1–10, Individuals who also assisted in the publication or representation of false statements regarding Mr. Obeidallah, Defendants.</p>	<p>CASE NO. 2:17-CV-00720-EAS-EPD Chief Judge Edmund A. Sargus Magistrate Judge Elizabeth Preston Deavers</p>
<p style="text-align: center;">DECLARATION OF TYLER WILLIAMS IN SUPPORT OF PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT</p>	

I, Tyler Williams, am an attorney licensed to practice law in the District of Columbia and am admitted *pro hac vice* in the above-captioned case. I am an attorney with Latham & Watkins LLP and am counsel of record for Plaintiff Dean Obeidallah in the above-captioned matter. My statements are based on personal knowledge, and if called as a witness about the facts contained in these statements, I could testify competently based on such personal knowledge.

I declare as follows:

1. **Sealed Exhibit A** to the Supplement to Plaintiff's Motion for Default Judgment, which has been filed with the contemporaneously filed Motion to Seal, are images of numerous checks deposited into a bank account belonging to Defendant Anglin, produced by a third-party financial institution that Plaintiff has not publicly named (ECF No. 47 at 7, 12).

2. **Sealed Exhibit B** to the Supplement to Plaintiff's Motion for Default Judgment, which has been filed with the contemporaneously filed Motion to Seal, are monthly statements associated with a bank account belonging to Defendant Anglin, produced by a third-party financial institution that Plaintiff has not publicly named (ECF No. 47 at 7, 12).

3. Attached as **Exhibit C** is a true and correct copy of a print-out from twitter.com/neonaziwallets, an automated feed of Bitcoin transactions involving suspected extremists' virtual "wallets", showing \$378,680.44 USD received by Andrew Anglin.

4. Attached as **Exhibit D** is a true and correct copy of the sworn declaration of Dean Obeidallah dated February 20, 2019

5. Attached as **Exhibit E** is a true and correct copy of an article published on the *Daily Stormer* website titled "White House Slams Fake News Hoaxsters as Journalist Squeal Like the Pigs They Are!", dated June 27, 2017, and signed by Andrew Anglin.

6. Attached as **Exhibit F** is a true and correct copy of an article published on the *Daily Stormer* website titled "Andrew Anglin has Retained America's #1 First Amendment Lawyer to Represent Him Against SPLC", dated June 10, 2017, and signed by Andrew Anglin.

7. Attached as **Exhibit G** is a true and correct copy of a print-out from Hatreon.net/Anglin, titled "Andrew Anglin is creating the *Daily Stormer*", and showing recurring donations of \$3,655 per month.

8. Attached as **Exhibit H** is a true and correct copy of an article published on the *Daily Stormer* website titled “SPLC is Suing Anglin! Donate Now to Stop These Kikes”, dated April 27, 2017.

9. Attached as **Exhibit I** is a true and correct copy of an article published on the *Daily Stormer* website titled “ISIS Operative Dean Obeidallah Says Moslems the Real Victims”, dated November 16, 2015, and signed by Andrew Anglin.

10. Attached as **Exhibit J** is a true and correct copy of an article published on the *Daily Stormer* website titled “Steven Crowder Allegedly Hunting Manchester Bombing Mastermind Dean Obeidallah in ISIS-Occupied Syria!”, dated August 29, 2017, and signed by Andrew Anglin.

11. Attached as **Exhibit K** is a true and correct copy of the Complaint filed by Plaintiff Tanya Gersh against Defendant Anglin et al. in *Gersh v. Anglin*, 9:17-cv-00050-DLC-JCL (D. Mont.).

12. Attached as **Exhibit L** is a true and correct copy of the Complaint filed by Plaintiff Taylor Dumpson against Defendant Anglin et al. in *Dumpson v. Ade*, 1:18-cv-01011-RMD (D.D.C.).

13. Attached as **Exhibit M** is a true and correct copy of the First Amended Complaint filed by numerous plaintiffs against Defendant Anglin et al. in *Sines v. Kessler*, 3:17-cv-00072-NKM-JCH (W.D. Va.).

14. Upon information and belief, Defendants Andrew B. Anglin and Moonbase Holdings, LLC are neither minors nor incompetent persons, nor currently serving in the military.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 2/22/2019

/s/ *Tyler S. Williams*
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